

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**FREE SPEECH SYSTEMS, LLC,**

**DEBTOR.**

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**Case No. 22-60043**

**Chapter 11 (Subchapter V)**

**NOTICE OF APPEAL**

Shannon & Lee LLP hereby submits this *Notice of Appeal* (the “Notice”) of the *Order Denying Debtor’s Application to Employ Bankruptcy Co-Counsel* [Docket No. 182] entered by the Bankruptcy Court on September 20, 2022.

**Part 1: Identify the appellant(s)**

1. Name of appellant(s):

Shannon & Lee LLP

2. Position of appellant(s) in the adversary proceeding or bankruptcy case that is the subject of this Appeal:

Applicant Professional

**Part 2: Identify the subject of this appeal**

1. Describe the judgment, order, or decree appealed from:

*Order Denying Debtor’s Application to Employ Bankruptcy-Counsel* [Docket No. 182] attached hereto as Exhibit A.

2. State the Date on which the judgement, order, or decree was entered:

September 20, 2022<sup>1</sup>

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<sup>1</sup> A motion for rehearing under Rule 7023 of the Federal Rules of Bankruptcy Procedure was filed on October 4, 2022 [Docket No. 206] and was denied on January 20, 2023 [Docket No. 401].

**Part 3: Identify the other parties to the appeal**

The names of all parties to the judgement, order, or decree appealed from and the names, addresses, and telephone numbers of their attorneys follows:

<b><u>Appellant</u></b>  Shannon & Lee LLP	<b><u>Counsel</u></b>  R. J. Shannon Shannon & Lee LLP 700 Milam Street, Suite 1300 Houston, TX 77002 Tel.: 713-714-5770 Email: rshannon@shannonleellp.com
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<b><u>Appellee 2</u></b>  Neil Heslin	<b><u>Counsel</u></b>  Avi Moshenberg McDowell Hetherington LLP 1001 Fannin Street, Suite 2700 Houston, Texas 77002 Tel: 713-337-5580 Email: avi.moshenberg@mhllp.com  Jarrod B. Martin Chamberlain, Hrdlicka, White, Williams, & Aughtry, PC 1200 Smith Street, Suite 1400 Houston, Texas 77002 Tel: 713-356-1280 Email: jarrod.martin@chamberlainlaw.com

<p><b><u>Appellee 3</u></b></p> <p>Scarlett Lewis</p>	<p><b><u>Counsel</u></b></p> <p>Avi Moshenberg  McDowell Hetherington LLP  1001 Fannin Street, Suite 2700  Houston, Texas 77002  Tel: 713-337-5580  Email: avi.moshenberg@mhlhp.com</p> <p>Jarrold B. Martin  Chamberlain, Hrdlicka, White, Williams, &amp;  Aughtry, PC  1200 Smith Street, Suite 1400  Houston, Texas 77002  Tel: 713-356-1280  Email: Jarrold.martin@chamberlainlaw.com</p>
<p><b><u>Appellee 4</u></b></p> <p>Leonard Pozner</p>	<p><b><u>Counsel</u></b></p> <p>Avi Moshenberg  McDowell Hetherington LLP  1001 Fannin Street, Suite 2700  Houston, Texas 77002  Tel: 713-337-5580  Email: avi.moshenberg@mhlhp.com</p> <p>Jarrold B. Martin  Chamberlain, Hrdlicka, White, Williams, &amp;  Aughtry, PC  1200 Smith Street, Suite 1400  Houston, Texas 77002  Tel: 713-356-1280  Email: jarrold.martin@chamberlainlaw.com</p>
<p><b><u>Appellee 5</u></b></p> <p>Veronique De La Rosa</p>	<p><b><u>Counsel</u></b></p> <p>Ryan Chapple  Cain &amp; Skarnulis PLLC  303 Colorado Street, Suite 2850  Austin, Texas 78701  Tel: 512-477-5000  Email: rchapple@cstrial.com</p>

<p><b><u>Appellee 6</u></b></p> <p>Marcel Fontaine</p>	<p><b><u>Counsel</u></b></p> <p>Ryan Chapple Cain &amp; Skarnulis PLLC 303 Colorado Street, Suite 2850 Austin, Texas 78701 Tel: 512-477-5000 Email: rchapple@cstrial.com</p>
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<u>Other Interested Party</u>	<u>Counsel</u>
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Dated: February 3, 2023

**SHANNON & LEE LLP**

/s/R. J. Shannon

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**CERTIFICATE OF SERVICE**

I hereby certify that on February 3, 2023, a true and correct copy of the foregoing document was served on all parties registered to receive ECF notification in the above captioned case.

/s/R. J. Shannon

**EXHIBIT A**

**APPEALED ORDER**



**ENTERED**

September 20, 2022

Nathan Ochsner, Clerk

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**FREE SPEECH SYSTEMS, LLC,**

**DEBTOR.**

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**Case No. 22—60043**

**Chapter 11 (Subchapter V)**

**ORDER DENYING DEBTOR'S APPLICATION  
TO EMPLOY BANKRUPTCY CO-COUNSEL**

The application to employ co-counsel at Docket 85 is denied for the reasons stated on the record at the September 20, 2022 hearing.

Signed: September 20, 2022

  
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Christopher Lopez  
United States Bankruptcy Judge